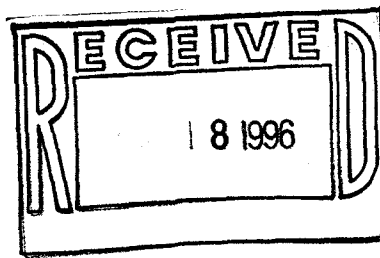




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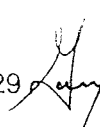


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11/18/96

INTEROFFICE MEMORANDUM

DATE: November 14, 1996

TO: Bill McAndrew, E. C. D&D, T130F, X4545

FROM: Gary Konwinski, Environmental Manager, T130F, X2729 

SUBJECT: RCRA STABLE CONFIGURATION FOR BUILDING 444-GRK-313-96

ACTION: For your information

John Wrapp and I had a meeting with the State to discuss the RCRA stable concept for Building 444. The discussion concerned a number of environmental issues that need to be addressed within the building. The resolution of these issues should result in a RCRA stable configuration, allow reduced management requirements, and eliminate some of the required RCRA inspections. Each of the specific compliance issues, in the order of preference, are discussed below.

1) Develop a RCRA stable configuration for Units 39.01 and 39.02. This process will involve removing the roll filters, placing them in crates, and managing them as low level mixed waste. One of the filters will be replaced with a cartridge type filter that is in the Building 444 warehouse. The other filtering location will be eliminated, with the feed and discharge lines being joined. The operating record will be clarified to indicate that system will be utilized for non-hazardous liquid waste from ground-water recovery. This process will allow the building inspection frequency to be changed to quarterly from the current daily frequency. A savings of 821 inspection hours annually will be realized.

Develop regulatory strategy	60 hours
Remove and containerize roll filters	80 hours
RCT support/prepare RWP	60 hours

2) There are a number of areas within the building that need additional light to safely conduct work. One of these is the area where the excess chemicals are stored. There are a number of light fixtures that contain burned out bulbs. Additionally, other areas within the building have similar needs.

Electrician	40 hours
RTC support	40 hours

Best Available Copy

ADMIN RECORD

IA -A-00019

3) There are numerous steam leaks within the building. The water from these leaking pipes flows into and across RCRA units. Due to this, it is not possible to determine the integrity of the secondary containment structures. There is a 10 to 12 item list of the repair locations that need attention. Fixing these locations will eliminate the need to treat these waters in Building 374 and will allow the RCRA stable configuration (item 1) to take place.

Pipe fitter	40 hours
RCT support	40 hours

4) There are about 400-600 excess chemicals stored in Building 444. These chemicals need an accurate inventory, packing, and removal from the building. There are also some analytical costs associated with this process.

Chemical inventory	200 hours
RCT support	140 hours
Pack chemicals	40 hours
Remove from building	40 hours
Analytical costs	10-40 K

5) A complete waste roundup is necessary for the building. There are several waste materials that are in need of management. They include lead, film, circuit boards, and batteries. A roundup of these items would include establishing a RMA within the controlled area, surveys for each item, and removal from the building.

Conduct roundup	160 hours
RCT support	80 hours
Pack radiological materials	20 hours
remove non-rad materials	20 hours

6) There is a piece of asbestos that has fallen from the basement ceiling. It has been isolated with a sheet of plastic. This material needs to be adequately packaged.

Package asbestos	10 hours
RCT support	6 hours

7) There are numerous drums of used and product oil throughout the building. An estimate would be between 70 and 100. These oils need to be inventoried, characterized, and placed into the program that ships oils to Oak Ridge National Laboratory for incineration.

Inventory oils	30 hours
Characterize oils	10 K
Ship oils to Building 774	40 hours

A summary of the information shown above as well as approximate dates for initiation and completion of the programs are shown in the accompanying table. I will status you on the progress of these items upon your request.

Task	Approximate Start Date	Approximate End Date	Hour/Cost Estimate	Regulatory Driver
RCRA Stable	10-06-96	12-20-96	200	Yes
Lights	11-13-96	11-29-96	80	No
Steam Leaks	11-18-96	12-15-96	80	Yes
Chemicals	11-12-96	12-31-96	420 10-40K	Yes
Waste Roundup	12-31-96	02-15-97	280	Yes
Asbestos	12-02-96	12-15-96	16	Yes
Oils	12-30-96	03-03-97	80 10K	Yes

To the best of my knowledge, this is a list of the compliance issues associated with Building 444. Completion of the tasks shown above will greatly reduce the mortgage costs, alleviate any RCRA concerns that the State has with the building, and provide a RCRA stable building configuration.

cc:
John Wrapp
Jerrilyn McAndrew
Candice Jierree
Dave Martin
Tom Bourgeois
Vern Guthrie
Mark McKeon
RMRS Records
File